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April 28, 2014

VIA ECF

Honorable Mark Falk, U.S.M.J.
United States District Court
United States Post Office & Courthouse
1 Federal Square
Newark, NJ 07102

Re: NXIVM v. The Ross Institute, et al.; Docket No. 06-cv-01051 (KSH) (MF)

Dear Judge Falk:

I write in response to Mr. Crockett's letter and Declaration of April 27, 2014, seeking to seal my recent application to the Court [Docket #548].

That application was made on behalf of my client, Rick Ross. He seeks to dismiss his claim against Kristin Keeffe because he now views Ms. Keeffe and her child as victims of the very organization whose objectives she previously served when it brought its lawsuit against Ross and others.

As to Mr. Crockett's request to seal that application, it is unclear on whose behalf he seeks to seal the matter. Nor does he attempt to address the factors that might justify a sealing order in this Circuit. As the Court knows, those factors were determined by *Pansy v. Borough of Stroudsburg*, 23 F.3d 772 (3d Cir. 1994), and I would welcome the opportunity to respond to any arguments in that regard Mr. Crockett may wish to make. I note, however, that I have already received a request for comment from a reporter who found my application on PACER, a request that I declined.

Mr. Crockett's allegations against me and Lowenstein Sandler will be addressed in a separate submission. For the moment, I simply deny, categorically, that either I or Lowenstein are the source of any communications Mr. Crockett received from Ms. Keeffe. Nor did I "persuade" her to discharge Mr. Crockett. The Court already has the entire text of my response to Ms. Keeffe upon my receipt of the email she sent to me on April 11, 2014, declaring that she wished "to remove [Mr. Crockett] as my attorney." My response to her followed consultation with Lowenstein's ethics counsel, and I believe it is fully compliant with applicable regulations and guidelines.

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Respectfully submitted,

/s/ Peter L. Skolnik

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cc: All Counsel via ECF